

REMARKS

Claims 1 - 17 are pending in the present application.

On 27 JUL 2004, Applicants conducted a teleconference with Examiner Lee. Applicants thank Examiner Lee for making time for the teleconference.

In section 2 of the Office Action, claims 1 - 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,139,302 to Hung et al. (hereinafter "the Hung et al. patent"), in view of U.S. Patent No. 5,459,570 to Swanson et al. (hereinafter "the Swanson et al. patent") and U.S. Patent No. 5,675,412 to Solomon (hereinafter "the Solomon patent"). During the aforementioned teleconference, Applicants and Examiner Lee discussed this rejection, and Applicants sent a proposed amendment to Examiner Lee to clarify an aspect of independent claims 1 and 15. Applicants incorporated the proposed amendment into the present document.

Claim 1 provides for a measurement unit. The measurement unit includes, *inter alia*, a fiber connection for connecting to a device under test (DUT), and an optical circuit for providing an optical signal from and/or to the DUT via the fiber connection.

The Hung et al. patent is directed toward a method and apparatus for mapping a deformation that occurs on a surface of an object as a result of stressing the object (col. 1, lines 7 – 11). Referring to FIG. 1 of the Hung et al. patent, a section of a surface 20 to be studied is illuminated with light that is derived from a laser 22 and passed through a diverging lens 26 (col. 5, lines 47 – 50). Light reflected from surface 20 is focused on a photographic plate 28 by a special lens 30 (col. 5, lines 57 – 60). Whereas the Hung et al. patent apparently requires **light from diverging lens 26 to illuminate surface 20, and be reflected by surface 20 to special lens 30**, the Hung et al. patent neither describes nor suggests **a fiber connection for connecting to a DUT**, and an optical circuit for providing an optical signal from and/or to the DUT **via the fiber connection**, as recited in claim 1.

Moreover, a modification of the Hung et al. patent to employ a fiber connection appears to be inconsistent with the operation of diverging lens 26 and special lens 30, and would therefore **change the principle of operation of the Hung et al. patent**. Consequently, the Hung et al. patent, whether considered independently or in combination with another reference, cannot be applied in a section 103(a) rejection of claim 1.

For the foregoing reasons, Applicants respectfully submit that claim 1 is patentable over the cited combination of the Hung et al., Swanson et al. and Solomon patents.

Independent claim 15 includes a recital similar to that of claim 1, as described above. Thus, for reasoning similar to that provided in support of claim 1, claim 15 is also patentable over the cited combination of references.

Claims 2 – 14, 16 and 17 depend from claim 1. By virtue of this dependence, claims 2 – 14, 16 and 17 are also patentable over the cited combination of references.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 1 – 17.

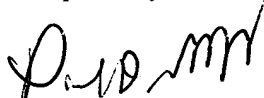
Applicants amended claims 1 and 15 to clarify an aspect of the claims that is neither described nor suggested by the cited combination of references. The amendment is not intended to narrow the meaning of any term of the claims, and as such, the doctrine of equivalents should be available for all of the elements of all of the claims.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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Date



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